

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CONNECTU LLC,

Plaintiffs,

v.

MARK ZUCKERBERG, EDUARDO SAVERIN,
DUSTIN MOSKOVITZ, ANDREW MCCOLLUM,
CHRISTOPHER HUGHES, and THEFACEBOOK,
INC.,

Defendants.

CIVIL ACTION NO. 1:04-CV-11923
(DPW)

MARK ZUCKERBERG, and THEFACEBOOK,
INC.,

Counterclaimants,

v.

CONNECTU LLC,

Counterdefendant,

and

CAMERON WINKLEVOSS, TYLER
WINKLEVOSS, and DIVYA NARENDRA,

Additional Counterdefendants.

**DECLARATION OF I. NEEL CHATTERJEE IN SUPPORT OF FACEBOOK
DEFENDANTS' OPPOSITION TO MOTION TO STRIKE ADMISSIONS**

I, I. Neel Chatterjee declare as follows:

1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel for Defendants Mark Zuckerberg, Dustin Moskovitz, Andrew McCollum, Christopher Hughes, and TheFacebook, Inc. (collectively, the "Facebook Defendants"). I make this Declaration in support of Facebook Defendants' Opposition to Motion to Strike Admissions. I am an active member in good standing of the California State Bar, and I am admitted to appear *pro hac vice*

before this court. I have personal knowledge of the facts stated therein and if called as a witness, could and would competently testify thereto.

2. The attached documents were all served in connection with *TheFacebook, Inc. v. ConnectU LLC et al* Case No. 1-05-CV-047381, Superior Court of the State of California, County of Santa Clara.

3. Attached hereto as **Exhibit A** is a true and correct copy of The Facebook, Inc.'s First Set of Requests for Admission Directed to Defendant Divya Narendra, served on September 26, 2005.

4. Attached hereto as **Exhibit B** is a true and correct copy of the Response of Defendant Divya Narendra to First Set of Requests for Admission, served on October 31, 2005.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct. This Declaration is executed on this 27th day of October, 2006, at Menlo Park, California.

/s/ I. Neel Chatterjee /s/

I. Neel Chatterjee

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on October 27, 2006.

Dated: October 27, 2006.

Respectfully submitted,

/s/ I. Neel Chatterjee /s/

I. Neel Chatterjee